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Mr. Devon Muto
Department of Planning and Land Use
5201 Ruffin Rd., Suite B
San Diego, CA 92123

RE: Comments on Draft General Plan 2020, County of San Diego

Dear Mr. Muto,

Thank you for the opportunity to provide comments on this Draft General Plan for San Diego County. It reflects well the years of experiences, staff work, and public input on the complex issues affecting how we live together in San Diego. Please consider making changes in three areas, outlined in this letter.

1. State policies affirmatively

Many policies are stated vaguely and tentatively, rather than stated as commitments to accomplish the objectives. The intent of the General Plan is to achieve certain future conditions in San Diego, and they need to be clearly and firmly stated. Replace “balance,” “encourage,” “promote,” and similar verbs with active, affirmative verbs such as protect, enhance, restore, remove, preserve, and prohibit.

For example, change the following words (underline to indicate additions, and overstrike to suggest deletions):

The primary focus of the Conservation and Open Space Element is to ensure ~~provide direction to balance the accommodation of future growth and development in the County of San Diego with~~ the following:

- The conservation, management, and utilization of natural resources
- The protection and preservation of open space
- The provision of park and recreation resources

As a second example, state the guideline as “protect” rather than “support the protection of:”

LU 6.1 **Environmental Sustainability.** ~~Support the Protection of critical intact~~ Intact or sensitive natural resources and the long-term sustainability of the natural environment.

As a third example, provide guidance that does not allow development to draw down the water table, under any circumstances, and this item uses an unenforceable and vague term, “discourage.”

LU 8.3 **Groundwater-Dependent Habitat.** ~~Discourage~~ Prohibit development that would draw down the groundwater table to the detriment of groundwater-dependent habitat.

The requirement for “consistency with community character” is also vague, and the unintended consequence may be to favor historically unsustainable patterns of development, rather than apply the new guidelines approved in this General Plan.

2. Guide policies with sustainability, not “balance”

The Conservation and Open Space Element section often uses the term “balance,” whereas the intent of this section is to define and apply the conservation values. Application of all the elements of the General Plan implies a balance among elements, and this conservation element should stand as a strong and equal element. Many of us have experienced “balance” is common word used justify continued development,

“Sustainability” is a more appropriate word to describe the considerations that must be considered for both development and the environment. The term originated in a 1987 United Nations report (“Our Common Future,” United Nations World Commission on Environment and Development), and should be used in the glossary:

Sustainable—Community use of natural resources in a way that does not ~~jeopardize the ability of future generations to live and prosper~~ compromise the ability of future generations to meet their own needs.

3. Strengthen wildfire safety provisions.

The following policy needs to reflect currently terminology for high wildfire hazard areas, and the definition of “very high and high fire hazard areas” (from the California Department of Forestry and Fire Protection,

http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones_development.php) needs to be added to the glossary.

LU 6.10 **Protection from Wildfires and Unmitigable Hazards.** Assign land uses and densities in a manner that minimizes development in very high and high hazard fire hazardous wildfire areas or other unmitigable hazardous areas.

Fire Hazard - A measure of the likelihood of an area burning and how it burns, developed to include the speed at which a wildfire moves, the amount of heat the fire produces, and most importantly, the burning fire brands that the fire sends ahead of the flaming front.

Certain safety features should not be compromised and subject to “feasibility” considerations. If a project is not safe for residents in a wildfire, it should not be built. Most fatalities in a wildfire have occurred during evacuation, often from areas that only have “one way out.” The guideline should read:

M 3.3 Multiple Ingress and Egress. Require development to provide multiple ingress/egress routes ~~whenever feasible~~ in conformance with State law, the Fire Code, and the Safety Element.

Section S-3.5 should be amended to reflect the requirement for multiple egress routes:

S 3.5 Secondary Access. In high fire hazard areas, Require development to include secondary access when the minimum distance to primary roadways in the Fire Code is exceeded or otherwise necessary to ensure adequate fire safety. ~~Where multiple routes are unavailable or infeasible in development, ensure that the same practical affect is achieved through site design, construction, and fuel management.~~

Secondary egress routes can be designed for emergencies, with no daily access for residents and service providers. When these secondary egress roads cross open space, most of the habitat, wildlife, recreational and scenic values can be preserved if they are established with minimum width for evacuation and fire access, maintained at low standards (not paved), and equipped with gates that are easily opened by residents and emergency service providers.

The term “fuel” needs to be defined and applied more correctly, in the “Fire Hazards Context” section (page 7-7), as man-made combustible materials, ancillary structures, ornamental (or landscape) vegetation, and natural vegetation. Fuel is mentioned in the defensible space item and then only vegetation is included in the fuel management item.

Defensible Space: Defensible space refers to a separation zone between wildlands and structures where fuel, is managed or modified.....

Fuel Management: Reducing, thinning, or otherwise modifying the amount of vegetation (fuel) reduces....

The following item should be included in this section:

Fuel: All structural elements, man-made combustible materials, ancillary structures, ornamental (or landscape) vegetation, and natural vegetation.

In addition, clarification should be provided for the difference between wildland fuel modification and that of defensible space around structures. This was discussed extensively in the past six months, among Department of Planning and Land Use staff, scientists, local wildfire professionals, and the San Diego County Planning Commission. Vegetation reduction may provide little or no benefit in wind-driven fires and ultimately increase the risk of fire through type conversion of chaparral and coastal sage scrub to invasive and flammable weeds. Such vegetation reduction reduces property losses in areas near the urban-wildland interface.

Fuel Management: Reducing, thinning, or otherwise modifying the amount of vegetation (fuel) in strategic locations adjacent to or near the wildland-urban interface reduces the risk of fire and helps slow the rate and intensity of a fire in low-wind conditions, and improves the survivability of structures.

Shelter-in-place is still poorly defined; has stringent construction and maintenance requirements, that are not defined in County code; assumes that residents have thorough, ongoing training and protective equipment (neither of which has been demonstrated yet in San Diego County); and puts citizens and firefighters at risk if unprepared and incapable residents are trapped within the wildfire perimeter. Shelter-in-place is not a substitute for secondary access in high hazard zones.

Section S-3 needs to clearly state that public fire risks can be minimized by avoiding or reducing development in high hazard areas, as indicated in S-1.1: (“Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.” A clear policy should be added to Section S-3:

Avoid risk to life and property. Avoid development or reduce its intensity in high to extreme fire hazard zones.

In section S-3.6, **Mitigation Measures**, the policy must require that structures in high hazard areas be built, retrofitted, and/or maintained to reduce risks of property and human losses in wildfires. The following policy should be added:

Fire safe construction. Because most structural fires are caused by wind-driven burning embers, require all new, remodeled, or rebuilt structures to meet current fire resistance construction codes and establish and enforce reasonable and prudent standards that require retrofitting of existing structures in high fire hazards areas.

Section S-4.1 should be revised to reflect the recent discussions among County staff, scientists, and wildfire professionals to add:

Fuel Management Programs. Support programs consistent with state law that require fuel management/modification within established defensible space boundaries, implement strategic fuel modification outside of defensible space only when necessary to protect structures or sensitive habitats, and balance fuel management needs with the preservation of native vegetation.

The glossary should be revised to include all flammable materials, not just vegetation, in a fuel modification zone. Outside of landscaped areas, it may not be necessary or desirable to replace natural vegetation with selected plant materials.

Fuel Modification Area—A wide strip of land where combustible vegetation and other combustible material has been removed or modified or both, and, with or without being partially or totally replaced with approved drought-tolerant, fire-resistant, and/or irrigated plants, to provide an acceptable level of risk.

Thank you for this opportunity to comment and to contribute to the sustainability of our lives together, as citizens of the County of San Diego.

Sincerely,



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cc: Jeff Murphy, Tom Oberbauer, Ralph Steinhoff, Ken Miller, and Chandra Waller, County